

1 McGREGOR W. SCOTT  
United States Attorney  
2 ROBERT M. TWISS  
ELLEN V. ENDRIZZI  
3 Assistant U.S. Attorneys  
501 I Street, Suite 10-100  
4 Sacramento, California 95814  
Telephone: (916) 554-2700  
5  
6  
7

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATE OF AMERICA,	) No.
	)
12 Plaintiff,	) VIOLATIONS: 18 U.S.C. § 371 -
	) Conspiracy to Violate the
13 v.	) Neutrality Act, 18 U.S.C. § 960;
	) 18 U.S.C. § 956(a)- Conspiracy
14 HARRISON ULRICH JACK;	) to Kill, Kidnap, and Maim;
GENERAL VANG PAO,	) 18 U.S.C. §§ 371, 2332g -
15 aka Pao Vang,	) Conspiracy to Receive and
aka Vang Pao;	) possess Missile Systems Designed
16 LO CHA THAO;	) to Destroy Aircraft; 18 U.S.C.
LO THAO,	) § 371 - Conspiracy to Receive
17 aka President Lo Thao,	) and Possess Firearms and
aka Xai Lo Thao;	) Destructive Devices, 18 U.S.C.
18 YOUA TRUE VANG,	) § 922(o), 26 U.S.C. § 5861;
aka Joseph Youa Vang,	) 18 U.S.C. § 371, 22 U.S.C.
19 aka Colonel Youa True Vang;	) § 2778 - Conspiracy to Export
HUE VANG;	) Listed Munitions Without a State
20 CHONG YANG THAO;	) Department License
SENG VUE;	)
21 CHUE LO;	)
NHIA KAO VANG; and	)
22 DANG VANG,	)
aka David Vang,	)
23	)
Defendants.	)

24  
25 I N D I C T M E N T

26 COUNT ONE: [18 U.S.C. § 371 - Conspiracy to Violate the  
27 Neutrality Act, 18 U.S.C. § 960]

28 the Grand Jury charges:

1 HARRISON ULRICH JACK;  
2 GENERAL VANG PAO,  
3 aka Pao Vang,  
4 aka Vang Pao;  
5 LO CHA THAO;  
6 LO THAO,  
7 aka President Lo Thao,  
8 aka Xai Lo Thao;  
9 YOUA TRUE VANG,  
10 aka Joseph Youa Vang,  
11 aka Colonel Youa True Vang;  
12 HUE VANG;  
13 CHONG YANG THAO;  
14 SENG VUE;  
15 CHUE LO;  
16 NHIA KAO VANG; and  
17 DANG VANG,  
18 aka David Vang

19 defendants herein, as follows:

20 I. PARTIES, PERSONS AND ENTITIES

21 1. Defendant HARRISON ULRICH JACK was a resident of  
22 Woodland, Yolo County, in the Eastern District of California.  
23 Defendant JACK operated a consulting business located at 101  
24 Monte Vista Drive, Woodland, California.

25 Defendant JACK is a graduate of the United States Military  
26 Academy at West Point, Class of 1968, and was commissioned upon  
27 graduation into the Infantry branch of the Army. He is a  
28 graduate of the Infantry Officer's Basic Course, Airborne School  
and Ranger School, as well as other Army professional training  
courses. He served at least one tour as an Army officer in  
Southeast Asia before being released from active duty in the Army  
in 1977. He is a retired military officer of the United States,  
having retired from the California National Guard with the rank  
of lieutenant colonel.

29 2. Defendant VANG PAO is a former general in the Royal Army  
30 of Laos, and came to the United States in or about 1975.

1 Defendant VANG Pao is the head of an organization known as the  
2 Neo Hom, and has lobbied on behalf of Hmong causes in the United  
3 States and in Laos. At all relevant times, defendant VANG Pao  
4 was a resident of Westminster, in Orange County, California.

5 3. Defendant LO CHA THAO was a resident of Clovis, in  
6 Fresno County, California.

7 4. Defendant Lo THAO, aka President Lo Thao, aka Xai Lo  
8 Thao, has been a resident of Sacramento County, California.

9 Defendant Lo THAO is the president of United Hmong International  
10 ("UHI"), which is also known as the Supreme Council of the Hmong  
11 18 Clans. Defendant THAO is the Thao clan representative on UHI.

12 5. Defendant YOUA TRUE VANG, aka Joseph Youa Vang, aka  
13 Colonel Youa True Vang, was a resident of Fresno, California, and  
14 is a founder of Hmong International New Year in Fresno.

15 6. Defendant HUE VANG was a resident of Clovis, California.  
16 He is a former Clovis police officer. Defendant VANG is the  
17 Director of United Lao Council for Peace, Freedom and  
18 Reconstruction.

19 7. Defendant CHONG YANG THAO was a resident of Fresno,  
20 California and is associated with a chiropractic clinic.

21 8. Defendants SENG VUE, who was a resident of Fresno, and  
22 CHUE LO, who was a resident of Stockton, are clan representatives  
23 in United Hmong International. Defendant NHIA KAO VANG was a  
24 resident of Rancho Cordova, California.

25 II. PRELIMINARY ALLEGATIONS

26 9. Laos, also known as the Lao People's Democratic Republic  
27 ("Laos") is a sovereign nation with which the United States has  
28 been at peace at all times relevant to this indictment. The

1 capital city of Laos is Vientiane.

2 10. A machine gun is one that will fire more than one  
3 round, or bullet, without manual reloading, with a single  
4 function of the trigger. It is a violation of federal law in the  
5 United States to possess, transfer, or receive automatic weapons  
6 unless authorized by law, such as members of the military who are  
7 assigned these weapons as part of their military mission, or  
8 unless registered with the National Firearms Registry maintained  
9 by the Bureau of Alcohol, Tobacco, Firearms, and Explosives.

10 11. An AK-47 is a machine gun that is manufactured in  
11 former Soviet Bloc countries, including Russia, other former  
12 Soviet Republics, and Poland. It is an automatic weapon within  
13 the meaning of Title 18, United States Code, Section 922(o) and  
14 Title 26, United States Code, Sections 5845(b) and 5861.

15 12. An M-16 is a machine gun that is manufactured in the  
16 United States for use by United States military departments.  
17 It is an automatic weapon within the meaning of Title 18, United  
18 States Code, Section 922(o) and Title 26, United States Code,  
19 Sections 5845(b) and 5861.

20 13. Grenades, rocket-propelled grenades, Claymore mines,  
21 C-4 explosives, LAW rockets, and AT-4 anti-tank rockets all are  
22 explosive devices within the meaning of Title 18 and Title 26 of  
23 the United States Code. It is a violation of federal law in the  
24 United States to possess, transfer, or receive these destructive  
25 devices unless authorized by law, such as members of the military  
26 who are assigned these weapons as part of their military mission,  
27 or unless registered with the National Firearms Registry  
28 maintained by the Bureau of Alcohol, Tobacco, Firearms, and

1 Explosives.

2 14. Stinger missiles are surface-to-air missiles that are  
3 designed to destroy aircraft.

4 III. THE CONSPIRACY

5 15. Beginning on a date unknown, but no later than in or  
6 about November of 2006, and continuing until on or about June 3,  
7 2007, in the Eastern District of California and elsewhere,  
8 defendants did conspire, combine, confederate, and agree with  
9 each other and with others both known and unknown to the grand  
10 jury, to violate the Neutrality Act, in violation of Title 18,  
11 United States Code, Section 960, by providing and preparing a  
12 means for and furnishing the money for and taking part in a  
13 military expedition or enterprise to be carried on against the  
14 territory and dominion of the foreign and sovereign nation of  
15 Laos, with which the United States is at peace.

16 16. The object of the conspiracy was to engage in the  
17 violent overthrow of the sovereign government of the nation of  
18 Laos, by engaging in an armed insurgency operation in Laos in  
19 violation of Title 18, United States Code, Section 960.

20 MANNER AND MEANS BY WHICH THE  
21 CONSPIRACY WAS CARRIED OUT

22 The manner and means by which the conspiracy was sought to  
23 be accomplished included, among others, the following:

24 17. Defendants General VANG Pao, Lo Cha THAO, Lo THAO, Youa  
25 True VANG, Hue VANG, Seng VUE, Chue LO and others formed a  
26 committee to evaluate the feasibility of conducting a military  
27 expedition or enterprise to engage in the overthrow of the  
28 existing government of Laos by violent means, including murder,

1 assaults on both military and civilian officials of Laos, and  
2 destruction of buildings and property of Laos.

3 18. Defendants Harrison JACK, General VANG Pao, Lo Cha  
4 THAO, Lo THAO, Youa True VANG, Hue VANG, Seng VUE, Chue LO and  
5 others utilized the well established Hmong tribal clan structure  
6 as part of the conspiracy. The defendants operated within the  
7 general scope of a Lao liberation movement known as Neo Hom, also  
8 known as the United Lao National Liberation Front. The  
9 acknowledged leader of the Neo Hom movement in the United States  
10 is defendant General VANG Pao.

11 19. Defendants General VANG Pao, Lo Cha THAO, Lo THAO, Youa  
12 True VANG, Hue VANG, Seng VUE, Chue LO and others, operating  
13 through or in conjunction with the Neo Hom movement, assigned  
14 rank and responsibilities to members of the committee and the Neo  
15 Hom movement.

16 20. Defendants General VANG Pao, Lo Cha THAO, Lo THAO, Youa  
17 True VANG, Hue VANG, Seng VUE, Chue LO and others engaged in  
18 extensive fund-raising activities for the purpose of acquiring  
19 substantial financial assets that could be used to purchase  
20 military arms, materiel, and munitions, such as AK-47 and M-16  
21 automatic rifles, Stinger missiles, LAW rockets, AT-4 anti-tank  
22 rockets, Claymore mines, C-4 explosive, night vision goggles,  
23 magazines, ammunition for all the weapons, medical kits, rain  
24 gear, and related military equipment.

25 21. According to defendant Lo Cha THAO, the defendants  
26 recruited intelligence assets to conduct surveillance and  
27 reconnaissance operations throughout Laos, including the national  
28 capital area in Vientiane, Laos.

1           22. According to the defendants, they recruited and  
2 organized a military force of insurgent troops within Laos, which  
3 were organized into military departments based upon provincial  
4 boundaries.

5           23. Defendants General VANG Pao, Lo Cha THAO, Lo THAO, Youa  
6 True VANG, Hue VANG, Seng VUE, Chue LO and others engaged in  
7 procurement operations to acquire military arms, equipment,  
8 materiel, and munitions for use in military operations in Laos.  
9 As part of the procurement process, the defendants recruited and  
10 utilized defendant Harrison JACK, a former career United States  
11 Army infantry officer who has contacts in the American military,  
12 homeland security, and defense contractor community.

13           24. As part of the attempt to acquire military arms and  
14 munitions, defendant Harrison JACK contacted at least one member  
15 of the defense contractor community from whom defendant JACK  
16 believed the defendants could purchase firearms, destructive  
17 devices, and other military arms and munitions.

18           25. As part of the attempt to engage in the violent  
19 overthrow of the government of Laos, defendants Harrison JACK,  
20 General VANG Pao, Lo Cha THAO, Lo THAO, Youa True VANG, Hue VANG,  
21 Seng VUE, Chue LO created an operational plan for armed  
22 insurgency operations in Laos.

23           26. Between January and June of 2007, the defendants  
24 collectively and individually inspected samples of military arms  
25 and munitions for purchase and delivery to Thailand and Laos,  
26 including: AK-47 machine guns; M-16A1 and M-16A2 machine guns,  
27 including some with grenade launchers; RPG-7 rocket-propelled  
28 grenade launchers; LAW rockets; AT-4 anti-tank rockets; Claymore

1 mines; C-4 explosives; a Stinger missile; and ammunition for  
2 AK-47 machine guns.

3 27. As part of the insurgency operation, the defendants  
4 attempted to secure the temporary services of a number of  
5 mercenary operatives with training and experience as special  
6 operations troops, such as former U.S. Army Special Forces  
7 soldiers or U.S. Navy SEALs, who have left military service and  
8 are now private citizens.

9 28. As part of the insurgency operation, the defendants  
10 issued an operations plan to the undercover agent to conduct a  
11 military strike in downtown Vientiane, Laos against specifically  
12 identified military and civilian government personnel and  
13 buildings. The defendants issued instructions that the mercenary  
14 force was to destroy these government facilities.

15 29. As part of the insurgency operation, defendants  
16 Harrison JACK, General VANG PAO, Lo Cha THAO, Lo THAO, Youa True  
17 VANG, Chue LO, Seng VUE and Hue VANG provided an ATF undercover  
18 agent with maps of Laos showing the emplacements of both  
19 insurgent and Lao government troops, as well as staging areas and  
20 landing zones into which personnel and equipment could be  
21 inserted for combat operations. Defendants Harrison JACK,  
22 General VANG PAO, Lo Cha THAO, Lo THAO, Youa True VANG, Chue LO,  
23 Seng VUE and Hue VANG identified on maps and photographs certain  
24 government buildings and facilities that they wanted destroyed in  
25 the opening hours of insurgent military operations against the  
26 government of Laos.

27 30. As part of the insurgency operation, defendants  
28 Harrison JACK, General VANG PAO, Lo Cha THAO, Lo THAO, Youa True

1 VANG, Chue LO, Seng VUE, CHONG YANG THAO, NHIA KAO VANG and Hue  
2 VANG negotiated the purchase of thousands of items of military  
3 arms, ammunition, and munitions. Pursuant to these negotiations,  
4 an initial installment of 125 AK-47 machine guns, 20,000 rounds  
5 of ammunition, and crates of smoke grenades was to be delivered  
6 to a safe house in Thailand on June 12, 2007. Defendants JACK,  
7 Lo Cha THAO, Lo THAO, and Chong Yang THAO identified a safe house  
8 in Thailand near the Laos border where the undercover agent  
9 should make the delivery.

10 31. As part of the insurgency operation, defendants JACK,  
11 Lo Cha THAO, Lo THAO, and Chong Yang THAO made arrangements for a  
12 second installment of military arms to be delivered to a remote  
13 location in Thailand on June 19, 2007. The second delivery of  
14 military arms included a number of Stinger missiles, the purpose  
15 of which is to destroy aircraft in flight.

16 32. As part of the insurgency operation, defendant Lo Cha  
17 THAO and other defendants made arrangements to personally deliver  
18 \$50,000 in United States currency to the undercover agent in  
19 Bangkok, Thailand on June 11, 2007.

20 OVERT ACTS

21 33. In furtherance of that agreement and to effect the  
22 objects thereof, one or more of the defendants or their  
23 co-conspirators performed the following overt acts in the Eastern  
24 District of California and elsewhere:

25 A. In or about November 2006, in the Eastern District  
26 of California, defendant Harrison JACK engaged in a telephone  
27 conversation with a third party regarding the purchase of 500  
28 AK-47 machine guns.

1           B. On or about January 23, 2007, in the Eastern  
2 District of California, defendant Harrison JACK engaged in a  
3 telephone conversation with an undercover agent from the United  
4 States Bureau of Alcohol, Tobacco, Firearms, and Explosives  
5 ("ATF") regarding the purchase of 500 AK-47 automatic rifles.

6           C. On or about January 25, 2007, in the Eastern  
7 District of California, defendant Harrison JACK met with an ATF  
8 undercover agent and engaged in a conversation regarding the  
9 purchase of 500 automatic rifles (either AK-47 or M-16), 3,000  
10 magazines, and more than 90,000 rounds of ammunition, along with  
11 the services of an unspecified number of mercenary special  
12 operations troops.

13           D. On or about February 1, 2007, in the Eastern  
14 District of California, defendant Harrison JACK engaged in a  
15 telephone call with the ATF undercover agent.

16           E. On or about February 5, 2007, in the Eastern  
17 District of California, defendant Harrison JACK left a telephone  
18 message with the undercover agent in which defendant JACK advised  
19 the agent that Wednesday would be an ideal time to meet, and that  
20 the highest leadership, including defendant General VANG PAO  
21 would be present.

22           F. On or about February 5, 2007, in the Eastern  
23 District of California, defendant Harrison JACK engaged in a  
24 telephone conversation with the undercover ATF agent, at which  
25 time defendant JACK advised the agent that he was on the other  
26 line with defendant General VANG PAO as they spoke, and that  
27 defendant JACK was going to bring four or five people to the  
28 meeting on Wednesday.

1                                   The February 7, 2007 Meeting

2                   G.    On or about February 7, 2007, in the Eastern  
3 District of California, defendant Harrison JACK, General VANG  
4 PAO, Lo Cha THAO, Lo THAO, Youa True VANG, Seng VUE, Chu LO, Hue  
5 VANG, and other associates engaged in a face-to-face meeting with  
6 the undercover agent at a restaurant in Sacramento, California,  
7 at which time the defendants engaged in a conversation with an  
8 ATF undercover agent regarding the purchase of automatic weapons,  
9 magazines, ammunition, explosives, LAW rockets, RPGs, Claymore  
10 mines, and other arms and munitions.

11                   I.   On or about February 7, 2007, in the Eastern  
12 District of California, defendant Harrison JACK, General VANG  
13 PAO, Lo Cha THAO, Lo THAO, Youa True VANG, Seng VUE, Chu LO, Hue  
14 VANG, and other associates provided an ATF undercover agent with  
15 several maps of Laos, showing locations purported to be Lao  
16 government military positions and insurgent forces positions.

17                   J.   On or about February 7, 2007, in the Eastern  
18 District of California, defendants Harrison JACK, General VANG  
19 PAO, Lo Cha THAO, Lo THAO, Youa True VANG, Seng VUE, Chu LO, Hue  
20 VANG, and other associates personally inspected a sample of AK-47  
21 and M-16 machine guns, C-4 explosives, LAW rockets, RPG  
22 launchers, Claymore mines, and other arms and munitions.

23                                   Communications Following the February Meeting

24                   K.   On or about February 15, 2007, in the Eastern  
25 District of California, defendant Harrison JACK contacted the ATF  
26 undercover agent to advise that he had just finished a major  
27 strategy meeting with approximately 22 senior leadership members.  
28 Defendant JACK said that they were "in motion" and had budgeted

1 for virtually everything on the weapons inventory/price list that  
2 the undercover agent had provided on February 7. The cost of the  
3 entire list that had been provided was approximately \$9.8  
4 million.

5 L. On or about March 5, 2007, in the Eastern District  
6 of California, defendant Harrison JACK met with the undercover  
7 agent for one hour and 45 minutes at a bar and grill in  
8 Sacramento. Defendant JACK advised the undercover agent that  
9 approximately three weeks earlier, he had organized and attended  
10 a conference call for all the Hmong leadership in the United  
11 States, and that he had been involved in several conversations  
12 with defendant General VANG Pao in which defendant General VANG  
13 Pao stated that they wanted to overthrow the government of Laos  
14 immediately. JACK told the undercover agent that the Neo Hom  
15 organization had people running operations on a regular basis,  
16 and that defendant JACK had been shown an operations plan that  
17 had impressed him.

18 M. On or about March 7, 2007, in the Eastern District  
19 of California, defendant Harrison JACK had a discussion with the  
20 undercover agent about Stinger missiles and their ability to take  
21 down helicopters that were spraying "yellow rain" in Laos.  
22 "Yellow rain" is a chemical agent that can kill or injure people  
23 who come into contact with it. Defendant JACK asked how soon the  
24 missiles could be in Laos.

25 N. On or about April 4, 2007, in the Eastern District  
26 of California, defendant Lo Cha THAO told defendant Harrison JACK  
27 that defendant General VANG PAO had ordered funding to be in  
28 place for a purchase.

1 O. On or about April 5, 2007, in the Eastern District  
2 of California, defendant Harrison JACK called defendant Lo Cha  
3 THAO and asked how soon defendant General VANG PAO would want to  
4 "round up any of that equipment like we were talking last time."

5 The April 12 & 13th Meetings

6 P. On or about April 12, 2007, in the Eastern District  
7 of California, defendant Harrison JACK met with the undercover  
8 agent at the a bar and grill in Sacramento, at which time JACK  
9 discussed with the undercover agent the prices for various  
10 armaments and told the undercover agent that he would be going to  
11 Stockton the following day to meet with the leadership.

12 Q. On or about April 12, 2007, in the Eastern District  
13 of California, defendant LO Cha THAO spoke to defendant Harrison  
14 JACK, and explained that defendant General VANG PAO would give  
15 the order pending the outcome of an intelligence mission inside  
16 Laos to determine if an unnamed person, with the proper  
17 equipment, could handle "the coup."

18 R. On or about April 12, 2007, in the Eastern District  
19 of California, defendant Lo Cha THAO asked defendant Harrison  
20 JACK to meet him the following day.

21 S. On or about April 13, 2007, in the Eastern District  
22 of California, defendants Harrison JACK and Lo Cha THAO met for  
23 approximately 25 minutes in the parking lot of the K-Mart store  
24 near Highway 99 and Farmington Road in Stockton.

25 T. On or about April 13, 2007, in the Eastern District  
26 of California, defendant Harrison JACK advised the undercover  
27 agent that he had learned from defendant Lo Cha THAO how the  
28 Hmong guerilla army in Laos is divided. He also told the

1 undercover agent that he should deliver the equipment to a  
2 staging area in Thailand, and that the staging area is a  
3 residence near the Laos border. JACK said that his Hmong  
4 contacts still wanted to hire mercenaries from the undercover  
5 agent.

6 The April 18th Meeting at the Doubletree

7 U. On or about April 18, 2007, in the Eastern District  
8 of California, defendants Harrison JACK, Chong Yang THAO, Chue  
9 LO, Hue VANG, and YOUA TRUE VANG met with the undercover agent in  
10 a room at the Doubletree Hotel, 2001 Point West Way, Sacramento,  
11 California, at which time they inspected a crate containing five  
12 AK-47 machine guns.

13 V. On or about April 24, 2007, in the Eastern District  
14 of California, defendants Hue VANG, Lo Cha THAO and Harrison JACK  
15 discussed with the undercover agent whether he could deliver a  
16 large quantity of machine guns, primarily AK-47s and M-16s with  
17 M-203 grenade launchers to various staging areas in Thailand  
18 along the Laos border. Defendant Lo Cha THAO explained that the  
19 time line depended on the outcome of an ongoing intelligence  
20 mission in Laos.

21 The April 24th Meeting at the Hilton

22 W. On or about April 24, 2007, in the Eastern District  
23 of California, defendants Lo Cha THAO, Nhia Kao VANG and seven  
24 associates met with the undercover agent in a hotel room at the  
25 Hilton Hotel in the Natomas section of Sacramento. When in the  
26 room, defendant Lo Cha THAO personally inspected five AK-47s in a  
27 crate, three AT-4 anti-tank rockets, one M-14 rifle, and one  
28 Stinger missile with a pistol grip and firing mechanism. Defen-

1 dant Lo Cha THAO told the undercover agent that they would need  
2 the Stinger missiles in the northern province of Laos and also  
3 down in the south, near Vientiane. Defendant Lo Cha THAO told  
4 the undercover agent that they would purchase two missiles and  
5 pistol grip firing mechanisms and two missiles for each.

6 Communications After the Hilton Meeting

7 X. On or about May 3, 2007, in the Eastern District  
8 of California, defendants Harrison JACK and Lo Cha THAO met with  
9 the undercover agent at a bar and grill in Sacramento, at which  
10 time, defendant Lo Cha THAO told the undercover agent that he  
11 (THAO) was waiting for intelligence from Thailand regarding the  
12 drop locations and that they were also in the process of  
13 interviewing and selecting prospective leaders who could mobilize  
14 people in Laos to carry out their plans.

15 Y. On or about May 7, 2007, in the Eastern District of  
16 California, defendant Harrison JACK called an associate and asked  
17 if she could assist him in doing some "due diligence" on the  
18 undercover agent.

19 Z. On or about May 7, 2007, in the Eastern District of  
20 California, defendant Lo Cha THAO told defendant JACK to calcu-  
21 late 100,000 for all the "ammos" (referring to ammunition) and  
22 the AK-47s. Defendant Lo Cha THAO told defendant JACK that those  
23 items will come in the second order because the first order is  
24 going to be by ground. Defendant THAO told defendant JACK that  
25 they will not need pyrotechnic because the order is not going to  
26 be by air. Defendant Harrison JACK told defendant Lo Cha THAO  
27 that the people on the ground will need smoke grenades in hand  
28 prior to the second shipment in order to mark drop locations and

1 landing zones. Defendant JACK told defendant Lo Cha THAO to  
2 "trust me on this one."

3 AA. On or about May 9, 2007, in the Eastern District  
4 of California, defendant Harrison JACK again called his associate  
5 and left a message asking her to run the undercover agent's name  
6 and number through the checks she has.

7 BB. On or about May 9, 2007, in the Eastern District  
8 of California, defendant Harrison JACK told the undercover agent  
9 that he had spoken with defendant Lo Cha THAO, and that defendant  
10 Lo Cha THAO wanted to complete the payment for the shipment in  
11 Mexico, Thailand or offshore in international waters.

12 CC. On or about May 9, 2007, in the Eastern District  
13 of California, defendant Harrison JACK told defendant Lo Cha THAO  
14 that the agent can have the first shipment of arms and munitions  
15 in Thailand on May 29, 2007.

16 The May 11th Meeting

17 DD. On or about May 11, 2007, in the Eastern District  
18 of California, defendants Harrison JACK and Lo Cha THAO met with  
19 the undercover agent at a bar and grill in Sacramento, at which  
20 time defendant Lo Cha THAO stated that Hmong insurgents were at  
21 rallying points right now. Defendant Harrison JACK also told the  
22 undercover agent that he had spoken to one of their strategic  
23 planners and was told that they had men in place. Defendant Lo  
24 Cha THAO told the undercover agent that he wanted the agent's men  
25 to do a "quick set up" in Vientiane, and said that any disaster  
26 would send the Laotian government out of the country. Defendant  
27 Lo Cha THAO told the undercover agent that he wanted seven or  
28 eight key government buildings blown up at the same time. Defen-

1 dant Lo Cha THAO told the undercover agent that he would need  
2 AK-47s, LAW rockets (Light Anti-Tank Weapons), AT-4 anti-tank  
3 rockets and Claymore mines.

4 The May 21 Conversation Between Harrison Jack and Lo Cha Thao

5 EE. On or about May 21, 2007, in the Eastern District  
6 of California, defendant Lo Cha THAO engaged defendant Harrison  
7 JACK in a lengthy discussion, at which defendant Lo Cha THAO  
8 passed along a large amount of intelligence that one of the  
9 conspirators' operatives has been collecting in Vientiane. Lo  
10 Cha THAO told JACK that he's got a man on the ground that is  
11 walking around like a tourist with his digital camera, trying to  
12 get whatever pictures he can. JACK and Lo Cha THAO discussed the  
13 Laos Royal Palace, and JACK said that the next time that Lo Cha  
14 THAO talks to his person on ground, Lo Cha THAO should identify  
15 the gate guard changes, including how they rotate, how many  
16 people rotate and where (specific locations - along a wall or if  
17 there is a checkpoint or if there is an entrance area).

18 The May 23rd Meeting

19 FF. On or about May 23, 2007, in the Eastern District  
20 of California, defendants Harrison JACK, Lo Cha THAO, Lo THAO,  
21 and Chong Yang THAO met with the undercover agent at a bar and  
22 grill in Sacramento. Defendant Lo Cha THAO pulled out a map of  
23 Thailand and Laos and identified several locations near the  
24 Thailand-Laos border where the undercover agent could deliver  
25 weapons. Defendant Lo Cha THAO showed the agent two locations on  
26 the map and said he wanted the first shipment divided and  
27 delivered to those locations. Lo Cha THAO advised the undercover  
28 agent that the second load of weapons and equipment would be

1 wanted 7 days after the first load. Lo Cha THAO indicated that  
2 it would take three or four loads to handle their needs for arms  
3 and munitions. JACK pointed out to defendant Lo Cha THAO that  
4 when the government buildings came down, defendant THAO had to  
5 have troops in place outside the buildings ready to take over and  
6 "do what they have to do. That is how you cut the head off the  
7 snake." Lo Cha THAO advised the undercover agent that defendant  
8 General VANG Pao was completely on board with the plan (to  
9 overthrow the government of Laos) and that defendant VANG Pao  
10 agreed with the operational plan. Defendant Lo Cha THAO said  
11 that defendant General VANG Pao was fully engaged in the  
12 discussion and was on board. Lo Cha THAO said, "We're the  
13 masterminds on this so the generals don't get into trouble."  
14 Defendant Lo Cha THAO said that defendant General VANG Pao wants  
15 to walk into Vientiane before he dies.

16 The Operation Plan

17 GG. In or about February 2007, defendant Dang VANG  
18 prepared a document titled "OPERATION POPCORN, A Comprehensive  
19 Plan of Action, Coup Operation" (the "Operation Plan"). During  
20 an interview, defendant Dang VANG admitted to authoring the  
21 Operation Plan. As written on the cover page of the Operation  
22 Plan, "POPCORN" is an acronym for "Political Opposition Party's  
23 Coup Operation to Rescue the Nation." Among other things, the  
24 Operation Plan details the means and methods the defendants will  
25 use to cause the overthrow of the current government of Laos and  
26 creates a budget for the purchase of weapons and other  
27 administrative actions.

28 All in violation of Title 18, United States Code, Sections

1 371 and 960.

2 COUNT TWO: [18 U.S.C. § 956(a) - Conspiracy to Kill, Kidnap,  
3 Maim and Injure People in a Foreign Country]

4 The Grand Jury further charges: T H A T

5 HARRISON ULRICH JACK;  
6 GENERAL VANG PAO,  
7 aka Pao Vang,  
8 aka Vang Pao;  
9 LO CHA THAO;  
10 LO THAO,  
11 aka President Lo Thao,  
12 aka Xai Lo Thao;  
13 YOUA TRUE VANG,  
14 aka Joseph Youa Vang,  
15 aka Colonel Youa True Vang;  
16 HUE VANG;  
17 CHONG YANG THAO;  
18 SENG VUE;  
19 CHUE LO;  
20 NHIA KAO VANG; and  
21 DANG VANG,  
22 aka David Vang,

23 defendants herein, as follows:

24 1. Paragraphs 1 though 14 and 17 through 33 of count one of  
25 this indictment are hereby referenced and incorporated as if  
26 realleged herein.

27 2. Beginning on a date unknown, but no later than on or  
28 about November 1, 2006, and continuing until on or about June 3,  
2007, in the Eastern District of California and elsewhere,  
defendants herein, did conspire, combine, confederate and agree  
with each other and others both known and unknown to the grand  
jury, regardless of where such person or persons were located, to  
commit at any place outside the United States an act that would  
constitute the offense of murder, kidnapping or maiming if  
committed in the special maritime and territorial jurisdiction of  
the United States, and in furtherance thereof did commit an act

1 within the United States to effect an object of the conspiracy.

2 In violation of Title 18, United States Code, Section  
3 956(a).

4 COUNT THREE: [18 U.S.C. § 2332g - Conspiracy to Receive and  
5 Possess Missile Systems Designed to Destroy  
Aircraft]

6 The Grand Jury further charges: T H A T

7 HARRISON ULRICH JACK;  
8 GENERAL VANG PAO,  
9 aka Pao Vang,  
10 aka Vang Pao;  
11 LO CHA THAO;  
12 LO THAO,  
13 aka President Lo Thao,  
14 aka Xai Lo Thao;  
15 HUE VANG;  
16 CHONG YANG THAO;  
17 YOUA TRUE VANG,  
18 aka Joseph Youa Vang,  
19 aka Colonel Youa True Vang;  
20 NHIA KAO VANG; and  
21 DANG VANG,  
22 aka David Vang,

23 defendants herein, as follows:

24 1. Paragraphs 1 through 14 and 17 through 33 of count one of  
25 this indictment are hereby referenced and incorporated as if  
26 realleged herein.

27 2. Beginning on a date unknown, but no later than on or  
28 about November 1, 2006, and continuing until on or about June 3,  
2007, in the Eastern District of California and elsewhere,  
defendants did conspire, combine, confederate and agree with each  
other and others both known and unknown to the grand jury, to  
knowingly acquire, transfer directly or indirectly, receive,  
possess, export or use, and attempt to possess and use an  
explosive or incendiary rocket or missile that is guided by any  
system designed to enable the rocket or missile to seek or

1 proceed towards energy radiated or reflected from an aircraft or  
2 toward an image locating an aircraft, and otherwise direct or did  
3 guide the rocket or device towards an aircraft, and a device  
4 designed or intended to launch or guide such a rocket or missile,

5 In violation of Title 18, United States Code, Section 2332g.

6 COUNT FOUR: [18 U.S.C. § 371- Conspiracy to Receive and Possess  
7 Firearms and Destructive Devices, 18 U.S.C.  
8 § 922(o), 26 U.S.C. § 5861]

8 The Grand Jury further charges: T H A T

9 HARRISON ULRICH JACK;  
10 GENERAL VANG PAO,  
11 aka Pao Vang,  
12 aka Vang Pao;  
13 LO CHA THAO;  
14 LO THAO,  
15 aka President Lo Thao,  
16 aka Xai Lo Thao;  
17 YOUA TRUE VANG,  
18 aka Joseph Youa Vang,  
19 aka Colonel Youa True Vang;  
20 HUE VANG;  
21 CHONG YANG THAO;  
22 SENG VUE;  
23 CHUE LO;  
24 NHIA KAO VANG; and  
25 DANG VANG,  
26 aka David Vang,

27 defendants herein, as follows:

28 1. Paragraphs 1 through 14 and 17 through 33 of count one of  
this indictment are hereby referenced and incorporated as if  
reallleged herein.

2. Beginning on a date unknown, but no later than on or  
about November 1, 2006, and continuing until on or about June 3,  
2007, in the Eastern District of California and elsewhere,  
defendants did conspire, combine, confederate and agree with each  
other and others both known and unknown to the grand jury, to  
commit offenses against the United States as follows:

1 (a) to knowingly transfer and possess one or more machine  
2 guns, in violation of Title 18, United States Code, Section  
3 922(o); and

4 (b) to knowingly receive and possess a firearm that is not  
5 registered to him in the National Firearms Registration and  
6 Transfer Record, in violation of Title 26, United States Code,  
7 Section 5861.

8 All in violation of Title 18, United States Code, Sections  
9 371 and 922(o) and Title 26, United States Code, Section 5861.

10 COUNT FIVE: [18 U.S.C. § 371 - Conspiracy to Export Listed  
11 Defense Items Without a State Department License,  
22 U.S.C. § 2778]

12 The Grand Jury further charges: T H A T

13 HARRISON ULRICH JACK;  
14 GENERAL VANG PAO,  
15 aka Pao Vang,  
16 aka Vang Pao;  
17 LO CHA THAO;  
18 LO THAO,  
19 aka President Lo Thao,  
20 aka Xai Lo Thao;  
21 YOUA TRUE VANG,  
22 aka Joseph Youa Vang,  
23 aka Colonel Youa True Vang;  
24 HUE VANG;  
25 CHONG YANG THAO;  
26 SENG VUE;  
27 CHUE LO;  
28 NHIA KAO VANG; and  
DANG VANG,  
aka David Vang,

defendants herein, as follows:

1. Paragraphs one through 14 and 17 through 33 of count one  
of this indictment are hereby incorporated as if fully set forth  
herein.

2. Between on or about November 1, 2006 and continuing to o  
or about May 29, 2007, in the State and Eastern District of

1 California, and elsewhere, defendants did knowingly and willfully  
2 conspire with each other and with persons both known and unknown  
3 to the grand jury to export from the United States to Laos, via  
4 Thailand, a quantity of defense articles, that is AK-47 automatic  
5 rifles; M-16A1 and M-16A2 automatic rifles, M-14 automatic  
6 rifles, Stinger missiles, LAWS rockets, AT-4 handheld anti-tank  
7 rockets, Claymore mines, rocket-propelled grenades, and C-4  
8 explosives, which are designated as defense articles on the  
9 United States Munitions List, without first having obtained from  
10 the Department of State a license for such exports or written  
11 authorization for such exports, in violation of Title 18, United  
12 States Code, Section 371, and Title 22, United States Code,  
13 Sections 2778(b) (2) and 2778(c), and Title 22, Code of Federal  
14 Regulations, Sections 121.1, 121.4, 123.1, 127.1(c) and 127.3.

15 All in violation of Title 18, United States Code, Section  
16 371 and Title 22, United States Code, Section 2778.

17 A TRUE BILL.

18 **/s/ Signature on file w/AUSA**

19 FOREPERSON

20   
21 MCGREGOR W. SCOTT  
22 United States Attorney  
23  
24  
25  
26  
27  
28